

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**PATRICIA ROBERTS,  
INDIVIDUALLY,  
AND AS ADMINISTRATOR OF  
THE ESTATE OF FRED JENKINS,  
DECEASED,**

**Plaintiff,**

**v.**

**THE TRAVELERS INDEMNITY  
COMPANY, THE TRAVELERS  
COMPANIES, INC., JANE DOE, JOHN  
DOE, ABC CORP., and XYZ CORP.,**

**Defendants.**

**CIVIL ACTION  
FILE NO.:**

**NOTICE OF REMOVAL**

COME NOW Defendants The Travelers Indemnity Company and The Travelers Companies, Inc. (hereinafter “Defendants”), Defendants in the above-styled civil action, and, pursuant to 28 U.S.C. § 1446, hereby remove the action now pending in the State Court of Gwinnett County, Georgia styled Patricia Roberts, Individually, and as the Administrator of the Estate of Fred Jenkins v. The Travelers Indemnity Company, The Travelers Companies, Inc., Jane Doe, John Doe, ABC

Corp. and XYZ Corp., Civil Action File No. 22-C-07327-S3, wherein Plaintiff demands judgment against Defendants, and respectfully show this Honorable Court as follows:

1. Jurisdiction is proper in this Court pursuant to 28 U.S.C. § 1332.
2. This is a civil action regarding Plaintiff's claims for negligence and bodily injuries against Defendants The Travelers Indemnity Company and The Travelers Companies, Inc. Based upon the allegations in Plaintiff's pre-suit demand, Defendants aver in good faith that Plaintiff is seeking to recover damages in excess of \$75,000.00, plus costs and attorney's fees. (See Affidavit of Andrew Craft, attached hereto as Exhibit "A").
3. At all times material to this action, Plaintiff was a citizen of the State of Tennessee. (See Plaintiff's Complaint, ¶¶ 1,2, attached hereto as Exhibit B).
4. At all times material to this action, Defendant The Travelers Indemnity Company was a foreign corporation incorporated in the State of Connecticut and having its principal place of business in Hartford, Connecticut. (See Defendant The Travelers Indemnity Company's Answer to Plaintiff's Complaint, ¶ 3, attached hereto as Exhibit C; See also Exhibit A). At all times material to this action, Defendant The Travelers Companies, Inc. was a foreign corporation incorporated in the State of Minnesota and having its principal place of business in New York, New

York. (See Defendant The Travelers Companies, Inc.'s Answer to Plaintiff's Complaint, ¶ 5, attached hereto as Exhibit D; See also Exhibit A).

5. This action was commenced in the State Court of Gwinnett County, Georgia on December 16, 2022. (See Exhibit B, generally). Defendant The Travelers Indemnity Company was served on December 28, 2022. Defendant The Travelers Companies, Inc. was purportedly served on January 6, 2023.

6. The affidavit of counsel, Andrew Craft, Esq., is submitted in support of this Notice of Removal, a true and correct copy of which is attached hereto as Exhibit A.

7. Pursuant to 28 U.S.C. § 1446 and the local court rules, copies of all process, pleadings and orders served upon Defendants and such other papers are filed herein.

8. Pursuant to 28 U.S.C. §1446(d), Defendants will provide written notice to all adverse parties and will file a copy of this Notice of Removal with the Clerk of the State Court of Gwinnett County, Georgia. Thereafter, Defendants will file copies of all filed notices to adverse parties and a copy of the Certification of Notice of Removal with this Court upon receipt from the State Court of Gwinnett County, Georgia.

WHEREFORE, Defendants respectfully submits this matter to this Court's jurisdiction.

Respectfully submitted this 26<sup>th</sup> day of January, 2023.

**LEWIS BRISBOIS BISGAARD & SMITH, LLP**

*/s/ Andrew Craft* \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

I hereby certify I have this day filed a true and correct copy of the foregoing ***NOTICE OF REMOVAL*** with the Clerk of Court utilizing the CM/ECF filing system, and served a copy of same upon all counsel of record, by U.S. First Class Mail, proper postage affixed thereto, as follows:

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*Counsel for Plaintiff*

This 26<sup>th</sup> day of January, 2023.

**LEWIS BRISBOIS BISGAARD & SMITH, LLP**

/s/ Andrew Craft  
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